

MEMO
WHITMOYER LABORATORIES, INC.
MYERSTOWN, PENNA, U. S. A.

cc: LJC ✓ → T.E.L.
JPG

Date December 4, 1978

To R. S. Rosera

From H. M. Huffman

DATE STAMP

135368

Subject: ARSENICAL WASTE EVAPORATION

On 12/1 I had a call from Mr. Desai of PA DER. He indicated that his superiors are unhappy with our occasional excursions of aniline emissions beyond the 20#/hour limit as set forth in our temporary operating permit.

I am currently arguing with them on the condensate pH limitation and hope to get some relief here. I will let you know how this comes out.

In interpreting the tone of the above conversation, I think 20#/hour aniline emission is going to be the limit the DER will approve.

Please review the impact of this against future operations:

1. What is evaporation capacity of existing system at an average aniline emission rate of 16#/hour with a peak of 20#/hour as our permit indicates.
2. What can be done to minimize the amount of aniline in the waste stream feed to the evaporator, and its impact on evaporator capacity.
3. What is the required evaporation capacity for future expansion? For now say 8 reactors/day.
4. What are the possibilities of the Oklahoma deep well disposal? Could this be a supplemental disposal with the present evaporation method? Could it be a total replacement disposal method over the present evaporation process. What are comparative out-of-pocket costs?

Accurate answers to the above questions will be absolutely essential to any further capacity expansion studies for the Arsanilic Acid plant.


Harold M. Huffman

AR100341

Station: 21.0 12-11-18
 J.R.S.
 H.M.H.
 R.S.R.

MONTHLY SUMMARY OF EMISSIONS: ARSENICAL WASTE EVAPORATION SYSTEM: DER APPLICATION NO. 38-313-010

All values (except pH) are lbs./hr.

Date: December - 1978

8100342

DATE OF SAMPLING	12-4	12-6										MONTHLY MEANS	MONTHLY MEANS LIMITS
pH of Final Stack													6 to 9
Emissions													
Limit = 6 to 9	6.47	6.42											
Total Arsenic													0.04
Max. Limit =													
0.1 #/s/hr.													
Aniline													16
Max. Limit =	13.22	13.19											
20 #/s/hr.													
Total Chlorides													0.42
Max. Limit =	0.478	0.274											
1.2 #/s/hr.													

12-1-78 A.S.R.

MONTHLY SUMMARY OF EMISSIONS: ARSENICAL WASTE EVAPORATION SYSTEM: DER APPLICATION NO. 38-313-010

All values (except pH) are lbs./hr.

Date: November-1978

37300

DATE OF SAMPLING	11-5	11-9	11-10	11-13	11-14	11-28	11-29					MONTHLY MEANS	MONTHLY MEANS LIMITS
pH of Final Stack Emissions limit = 6 to 9	6.52	6.20	5.8	6.4	6.50	6.33	6.41						6 to 9
Total Arsenic Max. limit = 0.1 #s/hr.	0.016	0.019	0.024	0.008	0.009	0.010							0.04
Aniline Max. limit = 20 #s/hr.	30.13	17.60	26.40	25.82	31.20	21.83	23.16						16
Total Chlorides Max. limit = 1.2 #s/hr.	0.304	0.195	0.424	0.401	0.460	0.420	0.545						0.42